

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BLACK LIVES MATTER SEATTLE-
KING COUNTY, ABIE EKENEZAR,
SHARON SAKAMOTO, MURACO
KYASHNA-TOCHA, ALEXANDER
WOLDEAB, AND ALEXANDRA CHEN,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-887

DECLARATION OF DAVID A. PEREZ IN
SUPPORT OF PLAINTIFFS' PETITION
FOR ATTORNEYS' FEES

I, David A. Perez, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I am a partner at Perkins Coie LLP, and I serve as lead counsel for Plaintiffs Black Lives Matter Seattle-King County, Abie Ekenezar, Sharon Sakamoto, Muraco Kyashna-Tocha, Alexander Woldeab, and Alexandra Chen in the above-entitled action. I submit this declaration in support of Plaintiffs' Motion for Temporary Restraining Order.

3. I graduated from Yale Law School in 2010. I clerked on the Ninth Circuit Court of Appeals from 2010-2011 and joined Perkins Coie in 2012. I have been admitted to practice in Washington and am an active member in good standing of the Washington Bar Association. I

1 have been admitted to practice in the Supreme Court of the United States; the U.S. Court of
2 Appeals for the First, Fourth, Ninth, and Eleventh Circuits; and the U.S. District Court for the
3 Eastern and Western Districts of Washington. I have also been admitted *pro hac vice* in various
4 other jurisdictions.

5 4. I became a Partner at Perkins Coie in 2019. My practice at the firm has centered
6 on trial and appellate litigation, particularly disputes involving constitutional law and civil rights,
7 in federal and state courts across the country. I have a strong record of pro bono civil rights
8 representation and currently chair the firm's Seattle Pro Bono Committee. During the time period
9 for which we seek to recover our fees and costs, my hourly rate was \$785 per hour.

10 5. Additionally, the diverse and talented Perkins Coie attorneys who handled this matter
11 (i.e., the contempt motion) under my direct supervision include Carolyn Gilbert, Rachel Haney,
12 Nitika Arora, Rachel Dallal, Paige Whidbee, Malori McGill, Delaney Butler, and Caitlin Hoerberlein.
13 Attached as **Exhibit A** is a true and correct copy of Perkins Coie time entries which Plaintiffs' seek
14 to recover, including the attorney or paralegal who recorded the time, a description of the work
15 performed and the time spent.

16 6. Carolyn Gilbert is an associate who graduated from UC Berkeley School of Law in
17 2016 and earned a B.A. from the University of Washington, *cum laude* and Phi Beta Kappa in 2012.
18 Attached as **Exhibit B** is a true and correct copy of her biography from Perkins Coie's website.
19 During the time period for which we seek to recover our fees and costs, Ms. Gilbert's hourly rate was
20 \$555 per hour.

21 7. Rachel Haney is an associate who graduated from Stanford Law School in 2017 and
22 earned a B.A. with honors from Pitzer College in 2011. Attached as **Exhibit C** is a true and correct
23 copy of her biography from Perkins Coie's website. During the time period for which we seek to
24 recover our fees and costs, Ms. Haney's hourly rate was \$500 per hour.

25 8. Nitika Arora is an associate who graduated from the University of Washington
26 School of Law, Order of the Barristers, in 2018 and earned a B.A. from Middlebury college, *cum*

1 *laude* in 2015. Attached as **Exhibit D** is a true and correct copy of her biography from Perkins
2 Coie's website. During the time period for which we seek to recover our fees and costs, Ms. Arora's
3 hourly rate was \$455 per hour.

4 9. Rachel Dallal is an associate who graduated from UC Berkeley School of Law in
5 2019, and earned a B.A. from Reed College, Phi Beta Kappa in 2014. Attached as **Exhibit E** is a
6 true and correct copy of her biography from Perkins Coie's website. During the time period for
7 which we seek to recover our fees and costs, Ms. Dallal's hourly rate was \$410 per hour.

8 10. Paige Whidbee is an associate who graduated from Stanford Law School in 2018, and
9 earned a B.A. from Williams College, *magna cum laude* and Phi Beta Kappa. Attached as **Exhibit F**
10 is a true and correct copy of her biography from Perkins Coie's website. During the time period for
11 which we seek to recover our fees and costs, Ms. Whidbee's hourly rate was \$410 per hour.

12 11. Malori McGill is an associate who graduated from the University of Washington
13 School of Law, Order of the Coif in 2020, and earned her B.B.A. from Gonzaga University, *magna*
14 *cum laude* in 2014. Attached as **Exhibit G** is a true and correct copy of her biography from Perkins
15 Coie's website. During the time period for which we seek to recover our fees and costs, Ms.
16 McGill's hourly rate was \$435 per hour.

17 12. Delaney Butler is an associate who graduated from the University of Pennsylvania
18 Law School, *cum laude* in 2020, and earned a B.S. from the University of Oregon, *magna cum laude*
19 in 2014. Attached as **Exhibit H** is a true and correct copy of his biography from Perkins Coie's
20 website. During the time period for which we seek to recover our fees and costs, Mr. Butler's hourly
21 rate was \$435 per hour.

22 13. Caitlin Hoeberlein is an associate who graduated from Harvard Law School in 2020,
23 and earned her B.A. from Columbia University, *cum laude* in 2013. Attached as **Exhibit I** is a true
24 and correct copy of her biography from Perkins Coie's website. During the time period for which we
25 seek to recover our fees and costs, Ms. Hoeberlein's hourly rate was \$270 per hour.
26

1 14. Perkins Coie's role in this litigation effort included conducting legal research,
2 reviewing documents and video evidence, drafting and reviewing pleadings, interviewing protesters
3 and drafting declarations, participating in litigation strategy decisions, and preparing co-counsel on
4 the hearing on Plaintiffs' motion for contempt.

5 15. We have each recorded our time contemporaneously for this matter. Although
6 Perkins Coie handled this matter on a *pro bono* basis, each timekeeper recorded his or her time in the
7 same manner as if they were billing a paying client. Perkins Coie policy requires each attorney and
8 paralegal to enter and release their time daily. Perkins Coie's policy further requires the billing
9 attorney on each matter to review bills to ensure their accuracy. I was the billing attorney for this
10 case, and I personally reviewed each time detail to ensure accuracy and appropriateness. The hours
11 spent by Perkins Coie attorneys and paralegals on this matter were recorded in this manner and
12 accurately reflect the work performed.

13 16. I have reviewed all entries billed by Perkins Coie at issue in this Petition. In
14 reviewing each time entry, I excluded any work not performed in support of Plaintiffs' Motion for
15 Contempt as well as administrative costs associated with legal research. I also excluded time entries
16 related to Plaintiffs' Motion for Contempt billed by attorneys at the Firm who did not directly
17 contribute to drafting the Motion, reviewing evidence, or performing other work essential to this
18 Motion. Finally, we cross checked our time entries where numerous attorneys billed to the same
19 event, such as a conference call, and reduced to the lowest billed amount.

20 17. While staffing the team and assigning work, I was conscientious of assigning work to
21 associates. To that end, I assigned much of the drafting and case coordination work to two mid-level
22 associates, Ms. Gilbert and Ms. Haney who further distributed appropriate assignments to junior
23 associates. This further reduced the Firm's attorneys' fees.

24 18. A true and correct copy of expenses in the amount of \$136,843.50 incurred by
25 Perkins Coie in litigating this particular motion are attached as **Exhibit A** to this declaration. Based
26

1 on my experience, I believe that these costs were reasonable and necessary for the tremendous, time
2 sensitive litigation effort that this motion required.

3 19. It is Perkins Coie's policy that all attorneys' fees recovered net of its out-of-
4 pocket expenses in pro bono cases be donated to non-profit providers and/or used for other Firm
5 pro bono cases. In other words, we do not profit from a fees award in a pro bono matter; instead,
6 we use the fees recovered to fund additional pro bono matters.

7
8 Executed this 17th day of December 2020 at Seattle, Washington.

9 I declare under penalty of perjury under the laws of the United States and the State of
10 Washington that the foregoing is true and correct.

11
12 By: s/ David Perez

13 DAVID A. PEREZ
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Exhibit A

Tkpr Name	Date	Base Hrs	Base Amt	Base Rate	Narrative
Dallal, Rachel	8/27/2020	1	410	410	Review communications regarding conflict between police and protesters on the night of August 26; review footage regarding same; communications with team regarding same;
Gilbert, Carolyn S.	8/27/2020	1.4	777	555	Review media footage of August 26 protests and police response thereto; draft letter to the City regarding the same;
Haney, Rachel A.	8/27/2020	1.5	750	500	Draft K. Krein declaration;
Perez, David A.	8/27/2020	0.8	628	785	Confer with team re potential violations of the Court order;
Robinson, Kiyomi R.	8/27/2020	0.8	236	295	Review livestream video of protests with evidence of police use of force;
Dallal, Rachel	8/28/2020	1.2	492	410	Review draft letter to city attorneys regarding same; review communication from J. Beckerman regarding testimony on July 25 protests; join team call regarding next steps in light of events of August 26;
Gilbert, Carolyn S.	8/28/2020	1.4	777	555	Confer with co-counsel regarding strategy in response to August 26 actions; follow up regarding the same; review media coverage of the same;
Haney, Rachel A.	8/28/2020	0.2	100	500	Attention to reports of S. Taylor vigil;
Perez, David A.	8/28/2020	1.1	863.5	785	Confer with co-counsel re recent incidents; revise letter to City;
Haney, Rachel A.	8/29/2020	0.2	100	500	Review strategy regarding vigil response;
Dallal, Rachel	8/31/2020	0.5	205	410	Contact potential deponent regarding availability for interview; begin drafting declaration for medic who assisted protesters at July 25 protests;
Haney, Rachel A.	8/31/2020	0.3	150	500	Correspond with M. Flynn regarding interview scheduling;
Haney, Rachel A.	9/1/2020	0.6	300	500	Correspond with M. Flynn regarding vigil; interview M. Flynn regarding same;

Dallal, Rachel	9/4/2020	0.6	246	410	Review City's letter regarding August 26, 2020 events; review team communications regarding same;
Haney, Rachel A.	9/4/2020	1.7	850	500	Summarize M. Flynn interview in response to City's letter regarding S. Taylor vigil;
Haney, Rachel A.	9/7/2020	1.70	50	500	Attention to media regarding labor day protests;
Dallal, Rachel	9/8/2020	0.9	369	410	Review communication from C. Gilbert regarding action items; review witness statement tracker spreadsheet; review communications about the president of SPOG doxxing journalist on Twitter; review C. Gilbert's draft letter to the City;
Gilbert, Carolyn S.	9/8/2020	3.4	1887	555	Confer with co-counsel; follow up regarding the same; draft letter to the City;
Haney, Rachel A.	9/8/2020	1.8	900	500	Attend telephone conference to discuss S. Taylor vigil response; review letter to City regarding same; revise K. Krein declaration;
Perez, David A.	9/8/2020	0.6	863.5	785	Telephone conference with co-counsel to discuss SPD's use of force; revise letter to City re LLW;
Robinson, Kiyomi R.	9/8/2020	1.1	324.5	295	Review social media link for potential exhibit and attorney review; review and respond to email correspondence related to preservation of same for court filing;
Dallal, Rachel	9/9/2020	1.1	164	410	Review team communications regarding police posting the press badge of a journalist covering the protests; review communications regarding strategy to address continued violations of the order; communications with associate team regarding new witness leads;
Gilbert, Carolyn S.	9/9/2020	0.4	499.5	555	Prepare and send letter to the City;
Haney, Rachel A.	9/9/2020	0.9	100	500	Review accounts of labor day protests;

Robinson, Kiyomi R.	9/9/2020	1.10	324.5	295	Review social media link for potential exhibit and attorney review; review and respond to email correspondence related to preservation of same for court filing;
Arora, Nitika	9/10/2020	0.50	227.5	455	Coordinate witness interviews;
Haney, Rachel A.	9/10/2020	0.40	200	500	Review strategies regarding Labor Day protest follow up with City;
Arora, Nitika	9/11/2020	1.80	819	455	Analyze City's letter; coordinate interviews; attend case team meeting regarding strategy, next steps, and assignments;
Dallal, Rachel	9/11/2020	2.00	820	410	Review letter from City; review team communications regarding same; review draft witness declarations; join team strategy conference;
Gilbert, Carolyn S.	9/11/2020	0.20	111	555	Review letter from the City regarding September 7 force;
Haney, Rachel A.	9/11/2020	0.30	150	500	Review City's response to labor day protests letter;
Arora, Nitika	9/12/2020	0.20	91	455	Coordinate witness interviews;
Arora, Nitika	9/13/2020	0.50	227.5	455	Identify potential witnesses; coordinate witness interviews;
Haney, Rachel A.	9/13/2020	0.30	150	500	Review declarations of SPOG labor day protests;
Arora, Nitika	9/14/2020	0.20	91	455	Identify potential witnesses; coordinate witness interviews;
Dallal, Rachel	9/14/2020	0.20	82	410	Review communications regarding possibility that SPD is running low of pepper spray and other gas cannisters;
Gilbert, Carolyn S.	9/14/2020	0.20	111	555	Review communications with co-counsel;
Dallal, Rachel	9/15/2020	0.40	164	410	Communications with M. Tack-Hooper and R. Smith regarding additional R. Smith declaration; review communications from team regarding structure of new declarations;
Gilbert, Carolyn S.	9/15/2020	0.20	111	555	Review correspondence regarding witness declarations;
Haney, Rachel A.	9/16/2020	1.30	650	500	Review motion for declaratory relief; telephone conference with witness K. Krein regarding Labor Day Protest;

Dallal, Rachel	9/17/2020	1.10	451	410	Review draft motion; join team meeting regarding motion for contempt;
Gilbert, Carolyn S.	9/17/2020	3.40	1887	555	Review draft motion for contempt; confer with R. Haney regarding the same; revise the same; confer with ACLU and Korematsu Center regarding the same;
Haney, Rachel A.	9/17/2020	5.40	2700	500	Revise motion for sanctions; attend telephone conference regarding motion strategy; revise K. Krein declaration; draft M. Flynn declaration;
Gilbert, Carolyn S.	9/18/2020	2.20	1221	555	Review and revise motion for declaratory judgment and order to show cause;
Haney, Rachel A.	9/18/2020	0.20	100	500	Attention to motion for declaratory relief;
Dallal, Rachel	9/19/2020	1.00	410	410	Interview R. Smith regarding his experience at the Labor Day SPOG protest; take notes regarding same;
Haney, Rachel A.	9/19/2020	4.80	2400	500	Draft motion for contempt; research standard for declaratory relief;
Haney, Rachel A.	9/20/2020	1.70	850	500	Strategize regarding request for declaratory relief;
Dallal, Rachel	9/21/2020	0.30	123	410	Review emails between team members regarding desired relief and motion strategy;
Haney, Rachel A.	9/21/2020	0.80	400	500	Strategize regarding motion for contempt or declaratory relief;
Dallal, Rachel	9/22/2020	0.80	328	410	Review team communications regarding approach to next filing and requested relief; review monitor's report on Seattle Police Department's handling of recent protests;
Haney, Rachel A.	9/22/2020	0.8	400	500	Strategize regarding filing motion for contempt;

					Review Seattle Times article regarding M. Bobb's report on Seattle Police Department's crowd control tactics; review team communications regarding same; review tweets regarding previous evening's protest; communications with M. Tack-Hooper regarding declaration of R. Smith; communications with R. Smith to schedule additional declaration
Dallal, Rachel	9/23/2020	1	410	410	interview;
Haney, Rachel A.	9/23/2020	0.4	200	500	Revise motion for contempt;
Arora, Nitika	9/24/2020	2	910	455	Analyze live stream footage of protests to identify potential violations of court order;
Dallal, Rachel	9/24/2020	2.5	1025	410	Review footage from previous night's protest; communications with R. Haney regarding witness declarations; draft R. Smith declaration regarding events of Labor Day protest;
Gilbert, Carolyn S.	9/24/2020	1.9	1054.5	555	Review motion for contempt; draft letter to the city and review background video footage and witness reports of the events 9/22 and 9/23 in support of the same;
Haney, Rachel A.	9/24/2020	5.5	2750	500	Interview N. Krell regarding September 23 events, correspond with K. Krein regarding same; coordinate review of September 23 videos; draft motion for contempt;
Robinson, Kiyomi R.	9/24/2020	1	295	295	Prepare supporting declarations for attorney review; update and revise witness accounts spreadsheet per attorney request;
Dallal, Rachel	9/25/2020	1.1	451	410	Review and incorporate M. Tack-Hooper's revisions to R. Smith declaration; coordinate with R. Smith for an additional interview; review news coverage of recent protest events; review SPD statements regarding recent protest events;

Gilbert, Carolyn S.	9/25/2020	2.7	1498.5	555	Prepare letter to the City regarding events on September 22 and 23; review and revise motion for contempt;
Haney, Rachel A.	9/25/2020	0.7	350	500	Revise motion for contempt;
Perez, David A.	9/25/2020	1.5	1177.5	785	E-mails with team re second contempt motion;
Robinson, Kiyomi R.	9/25/2020	1.3	383.5	295	Prepare supporting declarations for attorney review; update and revise witness accounts spreadsheet per attorney request;
Dallal, Rachel	9/26/2020	1.7	697	410	Review draft motion; interview R. Smith regarding events of 9/23/20; begin updating R. Smith's declaration;
Perez, David A.	9/26/2020	1.2	942	785	E-mails with team re motion for contempt;
Haney, Rachel A.	9/27/2020	0.9	450	500	Revise declarations of K. Krein and M. Flynn;
Dallal, Rachel	9/28/2020	2.8	1148	410	Draft additional section of R. Smith's declaration to include testimony regarding 9/23/20 protests; review draft motion for contempt; review communications regarding same; incorporate M. Tack-Hooper's revisions to R. Smith declaration; finalize R. Smith declaration with witness;
Gilbert, Carolyn S.	9/28/2020	3.7	2053.5	555	Review and revise motion to show cause;
Haney, Rachel A.	9/28/2020	3.5	1750	500	Correspond with declarants regarding finalizing declarations; review proposed order; review motion for order to show cause;
Perez, David A.	9/28/2020	1.1	863.5	785	Confer with team re motion for contempt;
Robinson, Kiyomi R.	9/28/2020	3.9	1150.5	295	Prepare supporting declarations for attorney review; update and revise witness accounts spreadsheet per attorney request;
Dallal, Rachel	9/29/2020	1.1	451	410	Coordinate with K. Robinson and M. Tack-Hooper to address formatting issues in R. Smith final declaration; review final draft of motion for contempt; review team communications regarding same;

Gilbert, Carolyn S.	9/29/2020	2.2	1221	555	Draft declaration of D. Perez in support of motion for contempt; draft and finalize motion, proposed order, and declarations;
Haney, Rachel A.	9/29/2020	0.8	400	500	Finalize K. Krein declaration for filing; attention to motion for contempt;
Perez, David A.	9/29/2020	3.3	2590.5	785	Attend to and confer with team about motion for contempt;
Robinson, Kiyomi R.	9/29/2020	7.3	2153.5	295	Prepare supporting declarations for attorney review; update and revise witness accounts spreadsheet per attorney request;
Dallal, Rachel	9/30/2020	0.2	82	410	Confirm finalization of witness declarations with C. Gilbert;
Gilbert, Carolyn S.	9/30/2020	4.3	2386.5	555	Prepare motion for contempt and related order and declarations for filing;
Haney, Rachel A.	9/30/2020	2.3	1150	500	Prepare motion for order to show cause and declarations for filing;
Perez, David A.	9/30/2020	2.1	1648.5	785	Revise motion for contempt;
Robinson, Kiyomi R.	9/30/2020	2.3	678.5	295	Prepare supporting declarations for attorney review; update and revise witness accounts spreadsheet per attorney request;
Dallal, Rachel	10/1/2020	0.4	164	410	Review mayor's executive order to evaluate Seattle Police Department functions; review communications from N. Talner regarding consent decree proceedings; review update from Judge Jones' chambers regarding request for status conference;
Haney, Rachel A.	10/1/2020	0.1	50	500	Attention to filing schedule;
Dallal, Rachel	10/2/2020	0.5	205	410	Review City's response to motion for contempt; review team communications regarding same;
Haney, Rachel A.	10/2/2020	0.6	300	500	Review City's opposition to order to show cause;
Haney, Rachel A.	10/4/2020	0.2	100	500	Attention to strategy on status conference;
Dallal, Rachel	10/5/2020	0.3	123	410	Review Allen declaration; review team communications regarding strategy for next steps regarding motion for contempt;

Gilbert, Carolyn S.	10/5/2020	0.2	111	555	Review correspondence with the Court and City regarding status hearing;
Haney, Rachel A.	10/5/2020	0.7	350	500	Review additional City declaration in opposition to order to show cause;
Dallal, Rachel	10/6/2020	0.1	41	410	Review communications regarding impending status conference;
Haney, Rachel A.	10/6/2020	0.2	100	500	Attention to upcoming status hearing;
Dallal, Rachel	10/7/2020	0.2	82	410	Review communications regarding research on less-harmful spray (as opposed to OC spray);
Gilbert, Carolyn S.	10/7/2020	0.4	222	555	Review and assess strategy for status hearing;
Perez, David A.	10/7/2020	0.4	314	785	Confer with team re legal strategy;
Dallal, Rachel	10/9/2020	0.1	41	410	Review 9th Circuit order denying stay of injunction in Portland protest case;
Gilbert, Carolyn S.	10/9/2020	0.5	277.5	555	Confer with B. Chang, M. Tack-Hooper, L. Nowlin, and D. Perez regarding strategy for status conference; follow up regarding the same;
Haney, Rachel A.	10/12/2020	0.3	150	500	Review Ninth Circuit order in Portland TRO;
Dallal, Rachel	10/13/2020	0.1	41	410	Review communications from M. Tack-Hooper regarding client news;
Gilbert, Carolyn S.	10/13/2020	0.1	55.5	555	Review communications;
Dallal, Rachel	10/14/2020	1.1	451	410	Join status conference regarding motion for contempt; review team communications regarding same;
Gilbert, Carolyn S.	10/14/2020	1.3	721.5	555	Attend status conference; follow up regarding the same;
Haney, Rachel A.	10/14/2020	0.9	450	500	Attend status conference; prepare for the same;
Perez, David A.	10/14/2020	1.3	1020.5	785	Hearing with J. Jones; e-mails with team re next steps;
Robinson, Kiyomi R.	10/14/2020	0.7	206.5	295	Attend portion of virtual status report meeting;
Dallal, Rachel	10/15/2020	0.6	246	410	Review LA Times article on less lethal projectiles, circulated by D. Perez; review draft joint submission from opposing counsel; review redline of same circulated by B. Chang;

Gilbert, Carolyn S.	10/15/2020	0.4	222	555	Strategy regarding joint statement;
Haney, Rachel A.	10/15/2020	0.1	50	500	Attention to status conference strategy;
Dallal, Rachel	10/16/2020	0.3	123	410	Review communications regarding revisions to draft joint submission;
Gilbert, Carolyn S.	10/16/2020	0.3	166.5	555	Strategy regarding joint statement;
Haney, Rachel A.	10/16/2020	0.6	300	500	Review proposed stipulation regarding contempt motion; attend meet and confer regarding same;
Perez, David A.	10/16/2020	0.8	628	785	E-mails with team re status conference and joint submission;
Robinson, Kiyomi R.	10/16/2020	0.5	147.5	295	Respond to attorney requests regarding updates to internal email distribution list;
Dallal, Rachel	10/18/2020	0.3	123	410	Review Seattle Times article regarding recent protest arrests; review team communications regarding same;
Haney, Rachel A.	10/18/2020	0.1	50	500	Attention to status hearing filing redlines;
Dallal, Rachel	10/19/2020	0.5	205	410	Review draft joint submission and team comments regarding same; review communications regarding interviewing arrest witnesses;
Gilbert, Carolyn S.	10/19/2020	1.4	777	555	Coordinate video production; strategy regarding joint submission;
Haney, Rachel A.	10/19/2020	0.7	350	500	Revise joint submission to court in advance of status hearing; attention to strategy regarding protest arrests;
Robinson, Kiyomi R.	10/19/2020	5.7	1681.5	295	Prepare video files cited in motion for contempt briefing for transmission to judge for review;
Arora, Nitika	10/20/2020	1	455	455	Attend status hearing; attend videoconference with case team following hearing;
Dallal, Rachel	10/20/2020	0.1	41	410	Review briefing schedule for motion for contempt;
Gilbert, Carolyn S.	10/20/2020	1.3	721.5	555	Attend status conference; prepare for and follow up regarding the same;
Haney, Rachel A.	10/20/2020	0.2	100	500	Attention to motion for contempt hearing strategy;
Perez, David A.	10/20/2020	0.4	314	785	Confer with R. Chang re hearing;

Whidbee, Paige L.	10/20/2020	0.5	205	410	Attend portion of status hearing regarding motion for contempt;
Dallal, Rachel	10/21/2020	0.3	123	410	Communications with M. Tack-Hooper and B. Chang regarding notifying witnesses of recent updates; share said updates with declarant R. Smith;
Haney, Rachel A.	10/21/2020	0.2	100	500	Correspond with declarants regarding case status;
Dallal, Rachel	10/22/2020	0.3	123	410	Review order regarding contempt proceedings; review team communications regarding same;
Haney, Rachel A.	10/22/2020	0.1	50	500	Review scheduling order;
Dallal, Rachel	10/23/2020	0.3	123	410	Review update from B. Chang regarding Portland contempt proceeding; review LA times article circulated by N. Talner regarding criticism of less lethal projectiles;
Gilbert, Carolyn S.	10/27/2020	0.7	388.5	555	Review and assess declaration review records;
Dallal, Rachel	11/2/2020	0.3	123	410	Review team communications regarding City's response to motion for contempt;
Gilbert, Carolyn S.	11/2/2020	1.5	832.5	555	Review City's response motion and supporting declarations;
Haney, Rachel A.	11/2/2020	1	500	500	Review supplemental response filings;
Butler, Delaney	11/3/2020	4.8	2088	435	Research prior declarations for plaintiff and defendant statements regarding 9/7 protest; telephone calls with R. Chang of Seattle University to discuss research strategy; telephone call with C. Hoeberlein and M. McGill to discuss research strategy;
Dallal, Rachel	11/3/2020	3.4	1394	410	Email witness R. Smith with case update; review City's opposition to motion for contempt; coordinate with Perkins team regarding reply in support of motion for contempt; research case law in support of same;
Gilbert, Carolyn S.	11/3/2020	4	2220	555	Strategy regarding response brief; review video footage submitted by City; review City Response brief; draft reply brief;

Haney, Rachel A.	11/3/2020	4.5	2250	500	Review supplemental response filings in preparation for reply; attend team conference to discuss reply in support of motion for contempt strategy; draft reply;
Hoeberlein, Caitlin	11/3/2020	1.3	351	270	Telephone conferences with M. McGill and D. Butler regarding video review and use of force reports; telephone conference with L. Nowlin and Malori McGill; review case files;
McGill, Malori	11/3/2020	1.75	761.25	435	Coordinate declaration review with team; discuss division of labor with C.Hoeberlein; review pleadings in case; attend call with L.Nowlin at ACLU;
Robinson, Kiyomi R.	11/3/2020	0.2	59	295	Respond to attorney requests regarding preparation of share files;
Arora, Nitika	11/4/2020	0.8	364	455	Analyze footage of potential PI violations; email summary of the same to case team;
Butler, Delaney	11/4/2020	4.15	1805.25	435	Research prior declarations for plaintiff and defendant statements regarding 9/7 protest; review video exhibits for factual analysis; telephone call with R. Chang to discuss research strategy reviewing 9/7 video;
Dallal, Rachel	11/4/2020	2.1	861	410	Research, review, and revise reply in support of motion for contempt;
Gilbert, Carolyn S.	11/4/2020	2.7	1498.5	555	Revise and draft reply brief;
Haney, Rachel A.	11/4/2020	4.3	2150	500	Review City's response evidence; draft motion to reply in support of motion;
Hoeberlein, Caitlin	11/4/2020	5.2	1404	270	Review August 26 video footage, declarations, and use of force reports related to City's response to motion to show cause;
McGill, Malori	11/4/2020	4.4	1914	435	Review videos for August 26 events in preparation of reply brief; add notes to reply brief spreadsheet; review August 26 declarations; discuss division of labor with C.Hoeberlein;

Butler, Delaney	11/5/2020	5.35	2327.25	435	Research prior declarations for plaintiff and defendant statements regarding 9/7 protest; telephone call with R. Chang of Seattle University to discuss research and drafting strategy; review opposing party exhibits;
Dallal, Rachel	11/5/2020	0.8	328	410	Revise draft reply in support of motion for contempt; communications with R. Haney and C. Gilbert regarding same;
Gilbert, Carolyn S.	11/5/2020	0.9	499.5	555	Review and revise reply motion;
Haney, Rachel A.	11/5/2020	1.5	750	500	Draft reply in support of motion for contempt; attend team conference to discuss same;
McGill, Malori	11/5/2020	0.8	348	435	Review videos for August 26 and edit spreadsheet tracker; email team with August 26 update;
Dallal, Rachel	11/6/2020	0.3	123	410	Review team communications regarding reply in support of motion for contempt;
Gilbert, Carolyn S.	11/6/2020	0.1	55.5	555	Review declaration edits;
Haney, Rachel A.	11/6/2020	0.1	50	500	Revise reply in support of motion for contempt;
Hoerberlein, Caitlin	11/6/2020	1.7	459	270	Review video footage and cross reference UFR's for August 26th demonstrations;
Perez, David A.	11/6/2020	1.3	1020.5	785	Review and revise reply brief on contempt;
Butler, Delaney	11/7/2020	1.2	522	435	Telephone call to discuss research analysis strategy; review exhibit summaries to provide data on editing of opposing counsel exhibits;
Haney, Rachel A.	11/7/2020	0.2	100	500	Review City's evidence for response to motion for contempt;
Hoerberlein, Caitlin	11/7/2020	6.8	1836	270	Conduct video and UFR review of September 23rd events;
Dallal, Rachel	11/8/2020	0.3	123	410	Review revisions to reply in support of motion for contempt;
Haney, Rachel A.	11/8/2020	5.6	2800	500	Draft reply in support of motion for contempt regarding City's failure to address violations; revise drafts of same;

Dallal, Rachel	11/9/2020	0.3	123	410	Review communications regarding revisions to reply in support of motion for contempt;
Gilbert, Carolyn S.	11/9/2020	2	1110	555	Finalize reply motion and video evidence;
Haney, Rachel A.	11/9/2020	2.8	1400	500	Draft and revise Reply in support of motion for contempt; attention to filing of same;
Perez, David A.	11/9/2020	1	785	785	Revise reply brief re contempt;
Robinson, Kiyomi R.	11/9/2020	1.5	442.5	295	Prepare supporting exhibits to reply in support of motion for contempt;
Dallal, Rachel	11/10/2020	0.5	205	410	Review finalized reply in support of motion for contempt;
Gilbert, Carolyn S.	11/10/2020	1.4	777	555	Prepare notice of filing physical evidence; submit the same;
Haney, Rachel A.	11/10/2020	1.1	550	500	Attention to praecipe for Chen declarations;
Perez, David A.	11/10/2020	0.4	314	785	Confer with team re errata declaration and thumb drives;
Robinson, Kiyomi R.	11/10/2020	2.5	737.5	295	Respond to attorney requests regarding preparation of video evidence for Court and city attorney;
Robinson, Kiyomi R.	11/11/2020	0.2	59	295	Respond to attorney requests regarding preparation of video evidence for Court and city attorney;
Dallal, Rachel	11/12/2020	0.2	82	410	Review communications regarding contempt hearing attendance;
Gilbert, Carolyn S.	11/12/2020	0.4	222	555	Coordinate video production; strategy regarding hearing;
Haney, Rachel A.	11/12/2020	0.4	200	500	Attention to notice of appearance and praecipe;
Robinson, Kiyomi R.	11/12/2020	0.7	206.5	295	Respond to attorney requests regarding preparation of video evidence and selected documents for co-counsel review;
Yeryomenko, Maxim A.	11/12/2020	0.4	114	285	Prepare electronic file transfer;
Dallal, Rachel	11/16/2020	0.7	287	410	Review communications regarding transcript for October 20 hearing; review communications regarding City's filing an updated report in support of opposition to motion for contempt; review redline changes of said report;

Gilbert, Carolyn S.	11/16/2020	1.4	777	555	Strategy regarding hearing on motion to hold the City in contempt (0.4); moot (1.0);
Haney, Rachel A.	11/16/2020	3.7	1850	500	Review praecipe for City's evidence; attend Moot in preparation for Contempt hearing; draft talking points to distinguish City of Oakland case at oral argument;
Robinson, Kiyomi R.	11/16/2020	1.1	324.5	295	Respond to attorney requests regarding preparation of video evidence for Court and city attorney;
Dallal, Rachel	11/17/2020	0.4	164	410	Re-review City's filings in opposition to motion for contempt;
Haney, Rachel A.	11/17/2020	0.7	350	500	Summarize Oakland case and distinguishing points in preparation for oral argument on motion for contempt;
Robinson, Kiyomi R.	11/17/2020	1.5	442.5	295	Respond to attorney requests regarding preparation of video evidence for Court and city attorney;
Dallal, Rachel	11/18/2020	2.8	1148	410	Join hearing regarding Plaintiff's motion for contempt; review team communications regarding same;
Gilbert, Carolyn S.	11/18/2020	3.2	1776	555	Attend hearing on plaintiffs' motion to hold the city in contempt; debrief the same;
Haney, Rachel A.	11/18/2020	3.1	1550	500	Attend hearing on motion for contempt; debrief with ACLU, Korematsu center, and C. Gilbert and N. Arora post hearing;
Dallal, Rachel	11/19/2020	0.3	123	410	Review notes circulated by R. Haney summarizing previous day's contempt hearing; review team communications regarding same;
Haney, Rachel A.	11/19/2020	0.8	400	500	Draft and circulate summary regarding hearing on contempt motion;
Robinson, Kiyomi R.	11/19/2020	1.5	442.5	295	Prepare video evidence provided by the City for attorney review;
Haney, Rachel A.	11/23/2020	0.1	50	500	Review request for posting declaration facts;
Robinson, Kiyomi R.	11/24/2020	1.6	472	295	Prepare video evidence provided by the City for attorney review;

Haney, Rachel A.	12/1/2020	0.1	50	500	Attention to Oregon contempt order;
Gilbert, Carolyn S.	12/7/2020	1.3	721.5	555	Confer with co-counsel regarding strategy for sanctions motion (0.5); review court order (0.5); follow up regarding the same and draft the motion for sanctions(0.3);
Haney, Rachel A.	12/7/2020	1	500	500	Review order on contempt; draft motion for contempt sanctions; strategize with C. Gilbert regarding same;
Perez, David A.	12/7/2020	1.6	1256	785	Review contempt order and confer with team re sanctions and next steps;
Gilbert, Carolyn S.	12/8/2020	2.5	1387.5	555	Draft motion for sanctions and proposed order;
Haney, Rachel A.	12/8/2020	4.7	2350	500	Research regarding civil contempt sanctions; draft motion for sanctions;
McGill, Malori	12/8/2020	7.35	3197.25	435	Research authorities on civil contempt sanctions in Ninth Circuits and Washington district courts and draft summary of findings for R. Haney (4.0); research examples of non-monetary coercive relief in civil contempt cases (2.85); send update to R. Haney and C. Gilbert on non-monetary coercive relief examples (0.5);
Perez, David A.	12/8/2020	0.7	549.5	785	Confer with team re sanctions motion;
Haney, Rachel A.	12/9/2020	1.5	750	500	Revise motion for sanctions;
McGill, Malori	12/9/2020	0.9	391.5	435	Revise sanctions motion with additional case law regarding non-monetary sanctions;
Haney, Rachel A.	12/10/2020	1.8	900	500	Draft proposed order; revise motion for contempt sanctions;
McGill, Malori	12/10/2020	1.3	565.5	435	Review Washington Supreme Court decision related to Seattle police and select potential quotes for sanctions motion; suggest redlines to incorporate quotes from Wash. S. Ct. opinion;

Whidbee, Paige L.	12/10/2020	0.9	369	410	Research procedure for filing motion for attorneys fees after filing brief outlining sanctions sought;
Gilbert, Carolyn S.	12/11/2020	1.1	610.5	555	Review and prepare final motion for sanctions;
Haney, Rachel A.	12/11/2020	0.2	100	500	Attention to filing of motion for contempt sanctions;
McGill, Malori	12/11/2020	0.90	391.5	435	Review motion for sanctions and proposed order for final edits and perform citation check;
		235.40	136843.5		

Exhibit B

Professional Biography



CAROLYN GILBERT | ASSOCIATE

SEATTLE
1201 Third Avenue, Suite 4900
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+1.206.359.3279
CarolynGilbert@perkinscoie.com

Carolyn represents clients in a variety of civil litigation and regulatory matters, with a focus on environmental litigation, compliance, government enforcement, and white collar investigations. Carolyn assists clients with compliance matters under federal and state laws, as well as in litigation matters regarding Superfund, State Superfund, government enforcement, citizen suit, and natural resource damage claims. She also represents clients in investigations relating to foreign anti-bribery, insider trading and anti-kickback statutes. Carolyn maintains an active pro bono practice, engaging in Deferred Action for Childhood Arrivals (DACA) clinics and asylum and clemency petitions.

RELATED EMPLOYMENT

- East Bay DREAMer's Clinic, Volunteer and Advocate, 2013 - 2016
- Perkins Coie, Seattle, WA, Summer Associate, 2015
- United States Attorney's Office Western District of Washington, Seattle, WA, Summer Law Clerk, 2014
- King County Prosecutor's Office, Seattle WA, Administrative Intern in the Economic Crimes Unit, 2012

EXPERIENCE

ENVIRONMENT, ENERGY & RESOURCES LITIGATION AND COUNSELING

LOWER DUWAMISH SUPERFUND SITE (SEATTLE, WA)

Representing manufacturer in multiparty Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Model Toxics Control Act (MTCA) allocation proceeding and other actions related to contaminated sediments.

HARBOR ISLAND SUPERFUND SITE (SEATTLE, WA)

Representing company in Model Toxics Control Act (MTCA) cleanup and natural resource damage defense.

PORTLAND HARBOR SUPERFUND SITE (PORTLAND, OR)

Representing company in multiparty CERCLA allocation proceeding, natural resource damage defense, and other actions related to contaminated sediments.

HOLDEN MINE SITE (CHELAN COUNTY, WA)

Representing successor to mine owner in defense of natural resource damage claims asserted by federal, state, and tribal natural resource trustees.

COLUMBIA RIVERKEEPER V. PUGET SOUND ENERGY (GOLDENDALE, WA)

Defending utility in citizen suit action alleging violations of Clean Water Act.

CONF. TRIBES AND BANDS OF THE YAKAMA NATION V. AIR LIQUIDE AMERICA CORP. ET. AL (PORTLAND, OR)

Defending company in natural resource damage action filed by natural resource trustee. No. 3:17-cv-00164-PK (D. Or. Jan. 30, 2017).

SOUTH STATE STREET MANUFACTURED. GAS SITE (BELLINGHAM, WA)

Representing former owner/operator regarding implementation of MTCA cleanup and allocation of responsibility among parties.

CENTRAL WATERFRONT SITE (BELLINGHAM, WA)

Representing owner/operator of parcel in defense of enforcement action and allocation of responsibility among parties.

KALAMAZOO RIVER SUPERFUND SITE (MICHIGAN)

Representing former paper mill operator regarding cleanup, allocation of responsibility among parties, and natural resource damage issues. *Georgia-Pacific Consumer Products LP v. NCR Corp. et al*, No. 1:11-cv-483 (W.D. Mich. Mar. 29, 2018).

PERMITTING

Work with clients to obtain and defend permits, licenses and other required government approvals.

COMPLIANCE

Assist clients in achieving and maintaining compliance with federal, state and local regulatory requirements.

REAL ESTATE TRANSACTIONS

Analyzed environmental issues in connection with the redevelopment of contaminated properties.

NEWS

12.08.2020

Perkins Coie Attorneys Mentioned in Multiple Publications Regarding Black Lives Matter and the City of Selah

General News

Perkins Coie attorneys were mentioned regarding the federal lawsuit in the city of Selah that claims the city violated residents' constitutional right to free speech by removing signs supporting the Black Lives Matter movement.

06.09.2020

Perkins Coie Attorneys Mentioned in Bloomberg Law - Perkins Coie Joins Black Lives Matter in Seattle Lawsuit

General News

Bloomberg Law

David Perez, Joseph McMillan, Mallory Gitt Webster, Carolyn Gilbert, Nitika Arora, Heath Hyatt, and Paige Whidbee were mentioned in the *Bloomberg Law* article, "[Perkins Coie Joins Black Lives Matter in Seattle Lawsuit](#)," regarding their representation of Black Lives Matter Seattle-King County.

AREAS OF FOCUS

PRACTICES

- Environmental Litigation
- Litigation

INDUSTRIES

- Energy Law

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- UC Berkeley School of Law, J.D., 2016
- University of Washington, B.A., International Studies, *cum laude*, 2012, Phi Beta Kappa

LANGUAGES

- Spanish

Exhibit C

Professional Biography



RACHEL HANEY | ASSOCIATE

SEATTLE
1201 Third Avenue, Suite 4900
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RHaney@perkinscoie.com

Rachel Haney defends companies in privacy and security litigation on a range of matters, including government investigations and data breach reporting. Her practice includes counseling companies on compliance with the Electronic Communications Privacy Act and the CyberTipline Modernization Act as well as government process. Rachel also represents clients in enforcement actions to combat platform abuse, including illegal spamming, harassment and trademark violations.

Rachel worked as a summer law clerk at the United States Attorney's Office for the Western District of Washington, where she drafted motions, trial briefs and memoranda for a wide range of criminal cases. She also externed at the King County Prosecuting Attorney's Office in the Special Assault Unit. Prior to attending Stanford Law School, Rachel was a Fulbright U.S. Student Grantee.

In her active pro bono practice, Rachel advocates for survivors of gender-based violence and human trafficking. She has drafted and argued motions for domestic violence protection orders and a motion to quash disclosure of a rape victim's mental health records, securing her clients relief from their abusers. Rachel is also active in the firm's Post-Conviction Advocacy for Survivors of Human Trafficking program, assisting survivors obtain vacatur of trafficking-related convictions. In addition, Rachel has conducted research and provided information on applicable state law for the nonprofit group Without My Consent, which aims to supply the public with tools to fight online harassment and privacy violations.

RELATED EMPLOYMENT

- King County Prosecuting Attorney's Office, Extern, 2016
- Perkins Coie, Seattle, WA, Summer Associate, 2016
- U.S. Attorney's Office, Western District of Washington, Law Clerk, 2015

AREAS OF FOCUS

PRACTICES

- Privacy & Security Law

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- Stanford Law School, J.D., 2017
- Pitzer College, B.A., History, with honors, 2011

Exhibit D

Professional Biography



NITIKA ARORA | ASSOCIATE

SEATTLE
1201 Third Avenue, Suite 4900
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NArora@perkinscoie.com

Nitika Arora is an associate in the firm's Commercial Litigation practice group. She assists clients with white collar matters, government investigations, complex commercial disputes involving business torts, unfair competition, antitrust, and commercial contracts, and election law litigation.

Nitika has experience providing pre-litigation counseling, managing e-discovery, conducting depositions, engaging in motions practice, and developing trial strategy.

Nitika also maintains a robust pro bono practice focused on civil rights impact litigation and advocating for survivors of gender-based violence. In a federal First and Fourth Amendment protection case, *Black Lives Matter Seattle-King County v. City of Seattle*, she led the effort to identify dozens of witnesses and assisted in legal research and expedited briefing to successfully obtain the most comprehensive court order protecting peaceful protestors in the country at the time. Nitika has successfully represented a domestic violence survivor at trial securing full custody of her children and drafted and argued motions for domestic violence protection orders. She also drafted and argued a motion to quash disclosure of a domestic violence survivors' iCloud data, securing her clients relief from their abusers.

COMMUNITY INVOLVEMENT

- API Chaya, Board Member, 2020 – present
- South Asian Bar Association of Washington, Board Member, 2018 – present
- William L. Dwyer Inn of Court, Member, 2017 – present

RELATED EMPLOYMENT

- API Chaya, Seattle, WA, Legal Intern, 2018
- Perkins Coie LLP, Seattle, WA, Summer Associate, 2016, 2017
- Obama for America, Redmond, WA, Organizing Fellow, 2012

NEWS

06.09.2020

Perkins Coie Attorneys Mentioned in Bloomberg Law - Perkins Coie Joins Black Lives Matter in Seattle Lawsuit

General News

Bloomberg Law

David Perez, Joseph McMillan, Mallory Gitt Webster, Carolyn Gilbert, Nitika Arora, Heath Hyatt, and Paige Whidbee were mentioned in the *Bloomberg Law* article, "Perkins Coie Joins Black Lives Matter in Seattle Lawsuit," regarding their representation of Black Lives Matter Seattle-King County.

PUBLICATIONS

08.30.2019

When to Choose Between a Lawsuit or Filing a Challenge With the NAD

Articles

AdWeek

A competitor has engaged in high-profile false advertising, and your CEO wants to use an enforcement hammer with more weight than a cease-and-desist letter.

PRESENTATIONS

07.08.2019

Introduction to Antitrust Law

Speaking Engagements

American Immigration Lawyers Association CLE Program / Seattle, WA

BLOG

National Advertising Division Launches Fast-Track Swift Process

On April 2, 2020 the National Advertising Division (NAD) launched its Fast-Track SWIFT (Single Well-defined Issue Fast Track) resolution process, promising to resolve single-issue cases in 20 business days. An overview follows. What is NAD? NAD is an organization within the Better Business Bureau (part of the BBB National Programs) which evaluates the truth and... Continue Reading...

NAD Reveals Initial Plans for 2020 Fast-Track Process

The National Advertising Division recently revealed its plans to launch a fast-track resolution process to resolve certain false advertising claims in a mere 2-4 weeks. This fast-track process will provide a useful tool for companies that want to quickly and efficiently challenge certain competitor advertising practices. In an email to BBB National Partners, the self-regulatory... Continue Reading...

AREAS OF FOCUS

PRACTICES

- Litigation
- Business Litigation

INDUSTRIES

- Advertising, Marketing & Promotions

BAR AND COURT ADMISSIONS

- Washington
- U.S. District Court for the Western District of Washington
- U.S. District Court for the Eastern District of Washington

EDUCATION

- University of Washington School of Law, J.D., Order of the Barristers, 2018
- Middlebury College, B.A., Economics, *cum laude*, 2015

LANGUAGES

- Hindi

Exhibit E

Professional Biography



RACHEL DALLAL | ASSOCIATE

SEATTLE
1201 Third Avenue, Suite 4900
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RDallal@perkinscoie.com

Rachel Dallal graduated from the University of California, Berkeley, School of Law, where she served as an articles and essays editor for the *California Law Review* and the online editor for the *Journal of Middle-Eastern & Islamic Law*. As co-chair of the Post-Conviction Advocacy Project, a student-led clinic, Rachel worked closely with a client in preparation for his successful parole hearing.

In a variety of roles, Rachel has developed her experience with privacy and data security matters. As a summer associate at an international law firm, she conducted research and wrote memoranda on third-party requests for user data and prepared a client-facing presentation on GDPR consent requirements. During her final semester of law school, she worked as a legal extern at the Canterbury District Health Board in Christchurch, New Zealand, where she drafted court submissions opposing the disclosure of patient records, evaluated the privacy implications of pilot health programs, and provided legal advice to agency clinicians. She also served as a summer intern at the Electronic Frontier Foundation, assisting a litigation team as it prepared to file a challenge to electronic device searches at the U.S. border.

Rachel earned her bachelor's degree from Reed College, where she graduated Phi Beta Kappa.

COMMUNITY INVOLVEMENT

- Post-Conviction Advocacy Project, Berkeley Law, Co-Chair & Student Advocate, 2016 - 2018
- Freedom House, Advocate, 2015 - 2016
- UC Hastings Center for Gender and Refugee Studies, Research Volunteer, 2015

RELATED EMPLOYMENT

- Canterbury District Health Board, Christchurch, New Zealand, Legal Extern, 2019
- Covington & Burling, San Francisco, CA, Summer Associate, 2018
- Electronic Frontier Foundation, San Francisco, CA, Legal Intern, 2017

AREAS OF FOCUS

PRACTICES

- Privacy & Security Law
- Ad Tech Privacy & Data Management
- General Data Protection Regulation (GDPR)

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- UC Berkeley School of Law, J.D., 2019, Articles & Essays Editor, *California Law Review*; Online Editor, *Journal of Middle-Eastern & Islamic Law*
- Reed College, B.A., Anthropology, 2014, Phi Beta Kappa

Exhibit F

Professional Biography



PAIGE L. WHIDBEE | ASSOCIATE

SEATTLE
1201 Third Avenue, Suite 4900
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PWhidbee@perkinscoie.com

Attorney Paige Whidbee is a graduate of Stanford Law School, where she served as editor-in-chief of the *Stanford Law and Policy Review* and won honors including the Gerald Gunther Prize for outstanding performance in legal research and writing. She also served as a law clerk in Stanford's Criminal Defense Clinic, where she drafted and argued motions on behalf of indigent clients.

Paige assists clients with environmental and business litigation matters. She has experience researching and analyzing environmental issues involving the Clean Air Act, Clean Water Act, and CERCLA. She also works on cases involving commercial contract disputes, healthcare, Washington State political advertising disclosure requirements, and other business litigation matters.

As an undergraduate, she worked as an investigative intern for the Public Defender Service for the District of Columbia, and as a historic building conservation intern for an architecture firm in Bath, England.

Paige graduated with highest honors from Williams College, where she was elected to Phi Beta Kappa and played on the 2015 NCAA Division III Women's Golf National Championship-winning team.

RELATED EMPLOYMENT

- Perkins Coie LLP, Seattle, WA, Summer Associate, 2017

NEWS

06.09.2020

Perkins Coie Attorneys Mentioned in Bloomberg Law - Perkins Coie Joins Black Lives Matter in Seattle Lawsuit

General News

Bloomberg Law

David Perez, Joseph McMillan, Mallory Gitt Webster, Carolyn Gilbert, Nitika Arora, Heath Hyatt, and Paige Whidbee were mentioned in the *Bloomberg Law* article, "[Perkins Coie Joins Black Lives Matter in Seattle Lawsuit](#)," regarding their representation of Black Lives Matter Seattle-King County.

AREAS OF FOCUS

PRACTICES

- Litigation
- Business Litigation
- Environmental Litigation

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- Stanford Law School, J.D., Editor-in-Chief, *Stanford Law and Policy Review*, 2018
- Williams College, B.A., History, with highest honors, *magna cum laude*, 2015, Phi Beta Kappa

Exhibit G

Professional Biography



MALORI MCGILL | ASSOCIATE

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Associate Malori McGill assists on commercial litigation matters, including drafting motions and researching statutes. Malori graduated fifth in her class at the University of Washington School of Law. While in law school, she served as Chief Articles Editor on the *Washington Law Review* and participated in the Ninth Circuit Appellate Advocacy Clinic. As part of her clinical work, Malori represented a client before the Ninth Circuit Court of Appeals in an immigration appeal, including briefing and arguing the case and ultimately winning a victory for her client. Prior to entering the legal field, Malori was a certified public accountant and worked at KPMG, serving as a lead for public and private company audits and reviews in accordance with the SEC and other accounting standards.

RELATED EMPLOYMENT

- Perkins Coie, Seattle, WA, Summer Associate, 2019
- Weyerhaeuser Company, Seattle, WA, Legal Intern, 2018

AREAS OF FOCUS

PRACTICES

- Business Litigation

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- University of Washington, J.D., High Honors, Order of the Coif, 2020, Chief Articles Editor, *Washington Law Review*
- Gonzaga University, B.B.A., Accounting and Finance, *magna cum laude*, 2014

Exhibit H

Professional Biography



DELANEY BUTLER | ASSOCIATE

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1201 Third Avenue, Suite 4900
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DButler@perkinscoie.com

Associate Delaney Butler was a summer associate for the firm in 2019, where he prepared legal memoranda on 18. U.S.C. 2703(f) preservation letters and client obligations under state education privacy laws. He also has experience preparing a legal memorandum on relevance of copying evidence in patent invalidation cases and conducting legal research on patent, trade secret, employment, and Computer Fraud and Abuse Act issues.

While earning his J.D. from University of Pennsylvania Law School, Delaney also obtained a Master of Computer and Information Technology from the University of Pennsylvania. He uses his experience with technology to offer an enhanced perspective into issues of privacy and data security. Delaney also was a student counselor at the Penn Law Detkin Intellectual Property Clinic. In this role, he provided extensive counseling for two small business clients in multiple intellectual property law areas including trademarks, patents, and privacy and data security.

RELATED EMPLOYMENT

- Perkins Coie, Seattle, WA, Summer Associate, 2019

AREAS OF FOCUS

PRACTICES

- Privacy & Security Law

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- University of Pennsylvania Law School, J.D., *cum laude*, 2020, Associate Editor, *University of Pennsylvania Journal of Constitutional Law*, Vol. 20
- University of Pennsylvania Graduate School of Engineering and Applied Science, Master of Computer and Information Technology, 2019
- University of Oregon, B.S., General Science and Political Science, *magna cum laude*, 2014

Exhibit I

Professional Biography

CAITLIN HOEBERLEIN | ASSOCIATE

SEATTLE

1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
+1.206.359.8160
CHoeberlein@perkinscoie.com

Caitlin Hoeberlein is an associate in Perkins Coie's Trademark, Copyright, Internet & Advertising practice. Caitlin was a summer associate at the firm, where she wrote memoranda regarding the state secrets privilege and antitrust standing for nonprofit plaintiffs, and drafted sections of an amicus brief related to juvenile life without parole sentencing.

While earning her J.D. at Harvard Law School, Caitlin interned at the U.S. Securities & Exchange Commission, where she conducted legal research and analysis and drafted a complaint for SEC litigation and investigations. She also observed and participated in witness interviews, whistleblower meetings, and hearings. She was also a judicial intern for the Honorable Chief Judge F. Dennis Saylor IV of the U.S. District Court for the District of Massachusetts, where she attended hearings and drafted judicial opinions. During law school, Caitlin was president of the HLS Negotiators and her team won the award for Best Negotiators at the 2019 CPR International Mediation Competition in Brazil.

Prior to law school, Caitlin earned her CPA license and worked as an accountant for Zillow Group, Inc.

RELATED EMPLOYMENT

- U.S. District Court for the District of Massachusetts, Boston, MA, Judicial Intern, 2019
- Perkins Coie, Seattle, WA, Litigation Summer Associate, 2019
- U.S. Securities & Exchange Commission, Boston, MA, Enforcement Intern, 2018
- Massachusetts Governor's Office of Legal Counsel, Boston, MA, Legal Intern, 2018

PUBLICATIONS

12.14.2020

Hot Ad Law Topics for 2021

Updates

Ring in the new year by avoiding practices that could result in class actions, regulatory enforcement actions, and competitor claims.

AREAS OF FOCUS

PRACTICES

- Intellectual Property Law
- Trademark, Copyright, Internet & Advertising

INDUSTRIES

- Advertising, Marketing & Promotions

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- Harvard Law School, J.D., 2020, Co-Editor-in-Chief, *Harvard International Law Journal*
- Columbia University, B.A., Sustainable Development and Mathematics, *cum laude*, 2013

